
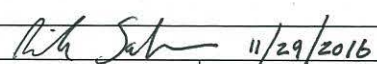
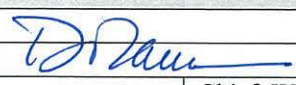


**Region 9 Enforcement Division
75 Hawthorne Street
San Francisco, CA 94105**

PHILLIPS 66 WILMINGTON INSPECTION REPORT

Inspection Date(s):	08/24/2015 – 08/28/2015		
Time:	Entry: 08:00	Exit: 14:00	
Media:	RCRA, CAA, CWA, EPCRA 313		
Regulatory Program(s)	BRS, Title V, NPDES, TRI		
Company Name: Phillips 66 Wilmington Refinery			
Facility or Site Name: Wilmington Refinery			
Facility/Site Physical Location: 1660 West Anaheim Street			
(city, state, zip code) Wilmington, California, 90744			
Geographic Coordinates: Latitude/Longitude 33.7768/-118.2889			
Mailing address: 1660 West Anaheim Street			
(city, state, zip code) Wilmington, California, 90744			
County: Los Angeles County			
Facility/Site Contact:		Marshall Waller	Superintendent, Environmental Services
		Marshall.g.waller@p66.com	
		(310) 952-6210	
Facility/Site Identifier: EPA ID: CAD008237679			
NAICS: 32411- Petroleum Refining			
SIC: 2911- Petroleum refining			
Facility/Site Personnel Participating in Inspection:			
John Matthews	P66 – Carson	Sr. Environmental Engineer	(310) 522-8039
Mike Bechtol	P66 Wilmington	Health and Safety Manager	(310) 952-6132
Cheryl Cobb	P66- Wilmington	Environmental Engineer	(310) 952-6120
Inspector(s):			
Richard Francis	Signature 		
Report Author	ENF 2-2	Environmental Engineer	(415) 972-3342
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Joseph Watson	Eastern Research Group (ERG)	Sampling Technician	Joe.watson@erg.com
Chris Krejci	ERG	Sampling Technician	Chris.krejci@erg.com
Peer Review:			
Name: Rick Sakow	Signature:  11/29/2016		
	ENF 2-2	Environmental Protection Specialist	(415) 972-3495
Supervisor Review:			
Douglas K. McDaniel	Signature:  12/5/16		
	ENF 2-2	Chief, Waste and Chemical Section	(415) 947-4106

SECTION I – INTRODUCTION

Purpose of the Inspection

On August 24, 2015 representatives of the U.S. Environmental Protection Agency (EPA) and Eastern Research Group, Inc. (ERG) conducted an unannounced hazardous waste management compliance evaluation inspection (CEI) of the Phillips 66 refineries in Carson and Wilmington, California. The purpose of the inspection was to determine Phillip 66's compliance with applicable federal environmental statutes and regulations.¹

Opening Conference

EPA Region 9 inspectors Kandice Bellamy, Richard Francis, Rick Sakow, and John Schofield, and Joe Watson of ERG, arrived at the Los Angeles Refinery Wilmington (LARW) facility at 08:40 a.m. on August 24th, 2015 to begin the unannounced inspection. The Inspection Team met with Cheryl Cobb, Environmental Engineer with Phillips 66, and held an opening conference where EPA personnel presented their credentials and explained that this was an EPA inspection to determine compliance with the facility's RCRA Permit and hazardous waste management practices. Ms. Cobb provided a safety briefing. Chris Krejci of ERG joined the inspection team on Tuesday and participated in the inspection through the rest of the week.

Facility/Site Description

LARW is a petroleum refinery that receives incoming intermediate products via underground pipeline from the Phillips 66 Carson Plant (LARC) approximately 5 miles to the northeast of the facility. LARW employs 450 personnel and runs a 24-hour operation divided into two shifts of 12 hours and has a throughput of crude oil of approximately 139,000 barrels per day. The footprint of the facility is approximately 400 acres.

LARW processes intermediate products from LARC into gasoline, liquid petroleum gas (LPG), California Air Resource Board (CARB) diesel, and jet fuel. These processes include fluid catalytic cracking (FCC), reforming/unifying, isomerization, alkylation, Penex, and hydro-cracking. LARW also operates an oil recovery unit (ORU) that uses two American Petroleum Institute (API) oil-water separators (east and west), three dissolved air flotation (DAF) units (A, B and C) for impurities, and an observation basin that discharges under a City of Los Angeles Industrial Wastewater Permit (W-536165) to the Los Angeles Terminal Island public owned treatment works (POTW). The sludge from the ORU is trucked to LARC where it is consolidated with other secondary oil-bearing materials for coking. LARW also operates a sulfur recovery unit (SRU) that feeds a sulfur plant, a hydrogen plant, and a selenium plant. Treated water from the selenium plant is routed back through the wastewater treatment system, and the filter cake from the selenium plant is managed on site as California hazardous waste (CA 181). LARW's auxiliary units include heat exchangers, cooling towers, boilers, reverse osmosis (RO) units, a sour water stripper, and an energy cogeneration plant. LARW operates five flare systems for hydrocarbon relief accumulation, uncracker hydrocarbon relief and recovery, south flare blowdown, north relief and recovery, and south relief and recovery. The flare systems are not in continuous operations, and facility personnel stated that the flares only operate during a turnover of equipment. LARW also has an operating lab for quality control.

¹ In particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273, and 279, and the facilities' Industrial Wastewater Permits, hereinafter referred to as the Pretreatment Permits or IWPP.

All waste from the lab is consolidated in a stationary tank and is sent to the ORU for oil recovery.

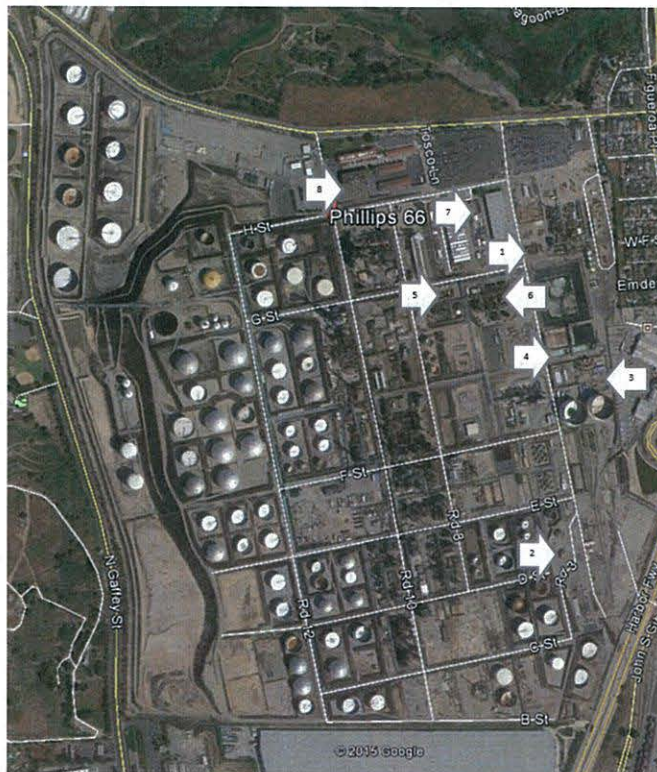
Much of the oily waste, such as K050 waste generated from heat exchange bundle cleaning, generated by the facility is routed back into the ORU or shipped to LARC for coking. Other waste, such as F037 API separator sludge is manifested off-site as hazardous waste. LARW manifests the following RCRA hazardous wastes according to their 2013 Biennial Report (BRS): D001, D002, D003, D004, D007, D008, D009, D018, D035, F002, F003, F005, F037, K048, K050, K051, K170, K171, U002, and U144. The following table summarized previous inspections of the LARW facility in the last five years and what areas of concern were noted in RCRA Info.

Table 1. Phillips 66 5-year compliance history.

DTSC Inspection Date	Observations
06/26/2013	- State Compliance Inspection with no violations found.

SECTION II – OBSERVATIONS

EPA Inspectors began the walk-through portion of the inspection on August 25, 2015 at 1:00 pm. Below is an aerial view of the LARW. The numbers inside the white arrows overlaid on the photograph correspond to the areas observed during the inspection and with the Section II's Subsections.



Photograph 1. Ariel view of LARW facility. Source: Google Earth 2015

1. Heat Exchange Bundle Cleaning Pad

The inspection began at the heat exchange bundle cleaning area or pad located in area 7 of the facility site plan (Appendix 6) north of the oil recovery unit (ORU) and east of the maintenance area. It is constructed of asphalt with a two-inch berm on three sides of the area. The berm is constructed of concrete and appears to have drainage holes to allow runoff into and out of the pad area. Inspectors noted minor amounts of debris and liquid inside the sump located in the northeast corner of the pad. Photos of the debris and water can be found in the attached photo log labelled IMG_0019 and IMGP0240, respectively. Cracks and gouges were also found on the surface of the concrete and can be seen in photographs IMG_0018, IMG_0011 and IMGP0241. Debris was also accumulating around the openings in the secondary containment of the heat exchanger bundle cleaning pad and can be seen in IMGP0250.

2. Hazardous Waste Accumulation Area #1

Hazardous waste accumulation area #1 is located on the southeast side of the facility east of Road 3 and south of the wastewater treatment area. The area is divided into three parts. The first is the roll-off bin storage area located in area 12 of the facility site plan (Appendix 6). Inspectors observed eleven roll-off bins: four roll-off bins with elemental sulfur sold for use in fertilizer; six blue roll-off bins with blasting grit; and one roll-off bin with vanadium sludge cake. Just east of the roll-off bin area, along the west side of Road 3, is the oil truck unloading area. Liquid oil was observed on the concrete surface of this area and can be seen in IMG_0028. The third part is located in area 3 of the site plan and is the primary hazardous waste accumulation area for the facility. Inspectors also observed 4 roll-off bins containing asbestos, 14 black and yellow vault totes containing spent hydro treating catalysts containing arsenic, 48 55-gallon containers with leaded blasting grit, refining sludge, contaminated soil, flammable solids, toxic solids, and spent vapor phase carbon. Three drums containing heat exchange bundle cleaning waste (K050) were in the area and labeled "TESTING – ANALYSIS PENDING." Universal wastes (batteries, florescent lights) were being stored in a shipping container to prevent weather exposure.

3. Hazardous Waste Accumulation Area #2

Hazardous waste accumulation area #2 is located just south of the ORU in area 5 of the facility site plan (Appendix 6). This area was well maintained and only contained empty drums of cleaner that were being used to for cleanout (turnaround) of tank TK-461. Inspectors observed one 5-gallon container with oily liquid outside of the fence in the vacuum truck cleaning area that can be seen in IMG_0044. This container was removed by a Phillips employee immediately, and the liquid was reintroduced into the ORU. Inspectors ended the August 25, 2015 portion of the inspection at 3:30 pm.

4. Oil Recovery Unit (ORU)

The LARW walk-through continued at the ORU, located in area 6 of the facility site plan (Appendix 6) on August 26, 2015 at approximately 10:00 am. LARW was preparing dissolved air flotation (DAF) units A and B for turnaround and had the area blocked off with plastic sheeting. Eight 20,000-gallon Baker tanks and carbon vapor recovery systems were also being staged in preparation for the turnaround. Facility personnel informed inspectors that the sludge from the DAF units were shipped to the LARC for coking. One Baker tank was observed having 16,000 gallons off hazardous waste (F038) inside with no labeling, which can be seen in photograph IMGP0273. LARW also had two API separators in operation as well as a single

observation basin that discharges to a POTW. North of the observation basin is a closed oil recovery pond² that the facility uses as a stormwater basin during extreme rain events. Inspectors observed debris along the bottom of the plastic lining, which can be seen in images IMGP0278 and IMG_0005. A pipe was leaking clean water from an eye wash station into the pond which can be seen in photograph IMGP0281. During sampling, inspectors entered the basin and observed tears in the plastic lining that can be seen in photograph IMG_0004.

South of the ORU an ENVENT Corporation burner was staged to incinerate vapors from the DAF. A carbon filter canister was between the DAF and the burner. LARW personnel stated that LARW has a site specific contract with ENVENT Corporation for this operation and ENVENT Corporation holds its own permit with South Coast Air Quality Management District (SCAQMD) for emissions.

5. Selenium Plant

North of the Sulfur Plant in the northwest corner of Area 26 of the facility site plan (Appendix 6) is the Selenium Plant. The Selenium Plant, however, is not directly identified on the facility site plan. The Selenium Plant is comprised of three treatment tanks (501-503), a clarifying tank, thickener tank, overflow tank, and a filter press that deposited filter cakes into a blue 20 cubic yard roll-off bin. The blue 20 cubic yard roll-off bin had a hazardous waste label attached, but did not identify any federal or state hazardous waste code on the label. At the time of the inspection, LARW was pumping accumulated liquid from the blue 20 cubic yard roll-off bin back into the selenium treatment tanks, as can be seen in photograph IMGP0294. Liquid was also observed leaking from the blue 20 yard roll-off bin into secondary containment, as can be seen in photographs IMGP0296 and IMGP0297.

6. Sulfur Plant

East of the Selenium Plant and north of the Sulfur Plant in area 16 of the facility site plan (Appendix 6), LARW has a treatment trailer set up to de-mineralize city water before it is used in the Sulfur Plant boiler system. Facility operator, Donald Beamon, stated that they usually use condensate for one boiler, but use treated city water when both boilers are operating.

7. Consolidated Maintenance Facility

North of the Sulfur Plant and east of the Fluid Catalytic Cracker in area 17 of the facility site plan (Appendix 6) is the consolidated maintenance facility. LARW only has one such facility, unlike LARC which has two. This area contains the welding area and a parts washing station north of the maintenance warehouse. Inspectors observed that the maintenance warehouse was kept in good order with containers properly labeled and debris kept off the floor. West of the maintenance warehouse is the maintenance shops, which consist of a bead blast area and a paint shop. In the bead blast area, inspectors observed one 55-gallon metal drum with solid grit with no accumulation start date on the container which can be seen in photograph IMGP0314. Gray blasting grit waste (California Waste code 181) was also observed on the floor and can be seen in photographs IMGP0315 and IMGP0316. North of the bead blast area is the paint shop. In the paint shop, inspectors observed multiple empty paint and aerosol cans, one five-gallon bucket with unknown liquid in it, and paint thinner expired for eight years in the flammable locker. Evidence of the paint shop's poor housekeeping can be seen in photographs IMGP0319 and

² Unocal (formerly Union Oil Company of California) submitted the closure application for Stormwater Holding Basin No. 2 and was approved by DTSC on July 24, 1995. On July 24, 2008 DTSC approved the renewed post-closure permit reflecting the change of ownership to Phillips 66.

IMGP0322. In the east exterior of the paint shop inspectors observed two open unlabeled 5 gallon containers with oily contaminated materials and used aerosol canisters, which are considered universal wastes. Photographs IMGP0326 and IMGP0327 show the two five-gallon containers.

8. Lab Area

LARW's lab is located north of the Fluid Catalytic Cracker and south of the administration building in area 38 of the facility site plan (Appendix 6). The lab is a two story building that consists of QA labs, a knock room, and stream storage area. Petroleum product stream samples are stored here for six months then poured down a drain, along with spent solvents, that feeds into a vapor-controlled 600-gallon tank (Tank 0) located on the east outside of the lab area. LARW personnel informed the inspectors that when Tank 0 is full it gets vacuumed out and the contents are sent to the ORU.

Paperwork Review

On August 27, 2015 EPA inspectors arrived back at the LARW facility to conduct paperwork review and take samples. The inspection team split into two teams with ERG and one EPA inspector taking samples and three EPA inspectors conducting the paperwork review. John Matthews and Marshall Waller from Phillips 66 were present to answer the inspection team's questions. These questions and answers can be found in Appendix 3, attached to this report. The following table lists all of the documents reviewed at the time of the inspection and the findings of that review. Documents unable to be reviewed were requested on the day of the inspection and are listed in Section IV of this report.

Table 2. Summary of documents reviewed on-site or requested.

#	Documents Reviewed	Findings
1	ORU inspection Logs (3 years)	LARW did not perform inspections in January or May 2015 and did not notify DTSC.
2	Management Organization Chart	No deficiencies found.
3	Site Map of Facility	Selenium Plant not identified on site map.
4	RCRA Variances or exemptions	None Claimed
5	Hazardous waste de-listings	No de-listings found
6	Wastewater Pretreatment Bypasses	No bypasses reported
7	Effluent Discharges to Stormwater Pond	No discharges reported.
8	Manifests for November 2012, August 2013, July 2014, and January 2015	No deficiencies found.

Sampling

As previously stated, two ERG personnel and one EPA inspector were escorted by Cheryl Cobb to conduct sampling at LARW on 08/27/2015. Split samples were taken so Phillips 66 could run their own analysis. Sample analysis from Pace Analytical, 1000 Riverbend Boulevard, St. Rose, Louisiana, is attached as Appendix 2. Sampling identifiers and locations are noted below:

Table 3. Wilmington Refinery Sampling Information

Sample ID	Sample Point Location	Sample Description	Media	Analysis Conducted	Results Total Metals
SP-1	Tank 68 Grit N 33.76959 W 118.28282	Grit sample collected from roll-off container in 90-day storage area.	Solid	-Metals (TCLP & Total) -Semivolatiles (TCLP & Total) -Volatiles (TCLP & Total)	Arsenic: 17.0 mg/kg Chromium: 37.6 mg/kg Below TCLP
SP-2	Selenium Plant Liquid N 33.77541 W 118.28604	Gray liquid collected beneath roll-off bin in selenium plant. Field pH: 3.79 Standard Units Temperature: 30.4 °Celsius	Liquid	-Metals (TCLP & Total) -Semivolatiles (TCLP & Total) -Volatiles (TCLP & Total) pH	Zinc: 114 mg/L pH: 3.6 Below TCLP
SP-3	Selenium Plant Solids N 33.77541 W 118.28604	Homogenous sludge taken from roll-off container in selenium plant	Solid	-Metals (TCLP & Total) -Semivolatiles (TCLP & Total) -Volatiles (TCLP & Total)	Chromium: 7.6 mg/kg Below TCLP
SP-4	Sediment from Northwest Corner of SBU-2 Pond N 33.77557 W 118.28358	Dry limestone gravel like material.	Solid	-Metals (TCLP & Total) -Semivolatiles (TCLP & Total) -Volatiles (TCLP & Total)	Chromium: 31.7 mg/kg Below TCLP
SP-5	Sediment from Southwest Corner of SBU-2 Pond N 33.77480 W 113.28339	Dry limestone gravel like material	Solid	-Metals (TCLP & Total) -Semivolatiles (TCLP & Total) -Volatiles (TCLP & Total)	Chromium: 12.6 mg/kg Below TCLP
SP-6	Field Blank - Near SBU-2 Pond	Distilled water.	Liquid	-Metals (TCLP & Total) -Semivolatiles (TCLP & Total) -Volatiles (TCLP & Total)	

SECTION III – SUMMARY OF FINDINGS

Table 4 summarizes findings for the RCRA investigation, identified by the EPA inspection team during the inspection. These findings were discussed during the closeout meeting with LARW personnel or identified post-inspection. The end of the table lists other areas of concern found during the inspection. These areas of concern may be California only violations, general housekeeping concerns, or other concerns that EPA inspectors noted.

Table 4. Summary of Findings for LARW

#	Regulatory Citation	Findings/Supporting Notes	Evidence
1	22 California Code of Regulations (CCR) § 66270.1(c) [40 CFR § 270.1(c)] – <i>A permit is required for the “transfer,” “treatment,” “storage,” and “disposal” of any waste which is hazardous waste...</i>	<ul style="list-style-type: none"> - LARW is storing and treating listed hazardous wastes Tank 0 without a permit. - During the inspection facility personnel stated that the spent solvents and product samples (F001-F005) are stored in Tank 0 then trucked to the ORU. This statement is supported by their 11/12/2015 response in Appendix 5. - LARW analyzes a number of materials in their laboratory. These materials include semi-processed crude from LARC as well as petroleum products (gasoline, jet fuel, diesel fuel, and liquid petroleum gas (LPG)). Spent solvents (F001-F005) and product samples from the laboratory are mixed together either during analysis or after disposal from the laboratory sinks. According to EPA’s mixture rule, when non-listed hazardous waste is mixed with a listed hazardous waste the entire mixture becomes a listed hazardous waste. (FR Vol. 46, No. 221, 56587 11/17/1981) 	<p>Appendix 5 Appendix 8</p>

#	Regulatory Citation	Findings/Supporting Notes	Evidence
2	<p>22 CCR §§ 66265.1050 through 66265.1064; [40 CFR §§265.1050 through 265.1064] - (a) <i>The regulations in this article apply to owners and operators of facilities that treat, store, or dispose of RCRA hazardous wastes (except as provided in Section 66265.1).</i></p>	<p>LARW has failed to manage equipment associated with Tank 0, used to accumulate spent solvent waste, in accordance with 40 CFR § 264 Subpart BB requirements. Subpart BB requirements include:</p> <ul style="list-style-type: none"> - Each open-ended valve shall be equipped with a cap, blind flange, plug, or a second valve. [§265.1056(a)(1)] None present at the time of inspection. - Each valve in light liquid service shall be monitored monthly to detect leaks. [§ 265.1057(a)] No LDAR program identified during inspection. - In the facility operating record (1) For each piece of equipment to which Subpart BB of pat 265 applies: (i) equipment identification number and hazardous waste management identification. (ii) approximate locations within the facility (on a plot pan) (iii) Type of equipment. (iv) percent-by-weight total organics in the hazardous waste stream at the equipment. (v) hazardous waste state at the equipment. (vi)Method if compliance with the standard. [265.1064(2)(b)(1)(i-vi)] <p>No documentation in the facility operating record identifying the tank or ancillary equipment.</p>	<p>Appendix 5 Appendix 8</p>

#	Regulatory Citation	Findings/Supporting Notes	Evidence
3	<p>22 CCR §§66265.1085(a)(1), 66265.1085(c)(2); 66265.1085(c)(4) [40 CFR §§265.1084(a)(1); 265.1084(c)(2); 265.1084(c)(4)]- <i>(a) The requirements of this article apply to owners and operators of all facilities that treat, store, or dispose of RCRA hazardous waste in tanks, surface impoundments, or containers subject to either articles 9, 10, or 11 except as section 66265.1 and subsection (b) of this section provide otherwise.</i></p>	<p>- LARW has failed to determine if Tank 0, used to accumulate hazardous wastes solvents, is subject to 40 CFR § 264 Subpart CC requirements. Subpart CC requirements include:</p> <p>- For a tank that manages hazardous waste that meets all of the conditions specified in paragraphs (b)(1)(i) through (b)(1)(iii) of this section the owner or operator shall control air pollutant emissions from the tank in accordance with the tank level 1 controls specified in paragraphs (c) of this section or the tank level 2 controls specified in paragraph (d) of this section.</p> <p>- The owner or operator shall develop and implement a written plan and schedule to perform the inspections and monitoring required by paragraph (a) of this section. The owner or operator shall incorporate this plan and schedule into the facility inspection plan required under 40 CFR 265.15 [§ 265.1089(b)]</p> <p>- Record keeping requirements specified in 40 CFR § 265.1090</p> <p>Facility had no documentation showing compliance with the regulations at the time of the inspection.</p>	<p>Appendix 5 Appendix 8</p>
4	<p>22 CCR §66265.190 Subpart J - Tank Systems [40 CFR §265.190] – Hazardous waste management facilities must comply with unit-specific regulations for hazardous waste tank in Subpart J</p>	<p>- LARW failed to manage the laboratory waste accumulation tank (Tank 0) in accordance with RCRA Subpart J. Subpart J requirements include:</p> <p>- Tank assessment from a professional engineer for integrity. [§ 265.191(a)]</p> <p>- If facility does not have a tank assessment then they must meet secondary containment requirements in 40 CFR § 265.193.</p> <p>No tank assessment or secondary containment at the time of the inspection.</p>	<p>Appendix 5 Appendix 8</p>

#	Regulatory Citation	Findings/Supporting Notes	Evidence
5	California DTSC hazardous Waste Post Closure Permit (effective date: July 24, 2008) page 11-12 – “Any water that collects on top of the liner will be removed by pumping.” 22 CCR § 66270.30(a) [40 CFR § 270.30(a)] 22 CCR § 66270.1(c) [40 CFR § 270.1(c)]	<ul style="list-style-type: none"> - EPA inspectors observed water and debris on the surface of the closed ORU basin. - EPA inspectors observed tears in the lining of the closed ORU basin. - Facility did not notify DTSC of missed inspections for January or May 2015 for the closed ORU basin. <p>Records of the inspections are maintained electronically at the facility. Inspectors observed the missed inspections on the facility’s database but did not request a printout.</p>	IMGP0278.JPG IMG_0005.JPG IMG_0004.JPG Appendix 1 California DTSC hazardous Waste Post Closure Permit (effective date: July 24, 2008)
6	22 CCR § 66265.31, as referenced by § 66262.34(a)(4) Maintenance and Operation of Facility [40 CFR § 265.31, as referenced by § 262.34(a)(4)] – Facilities shall be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.	<ul style="list-style-type: none"> - EPA inspectors observed cracks and gouges on the pavement for the heat exchanger bundle cleaning pads. - EPA inspectors observed holes in the concrete berm which prevents containment of the waste that is placed on the pad. - Debris was observed around the heat exchange bundle cleaning pad and outside of the secondary containment for the area. - Liquid and debris were found inside the sump for the heat exchanger bundle cleaning pad. The sump is not connected to any sewer system and material must be pumped out by the facility. <p>Heat exchange bundle cleaning pads contain K050 waste when in operation.</p>	IMG_0011.JPG IMG_0018.JPG IMGP0241.JPG IMG_0019.JPG IMGP0250.JPG Appendix 1
7	22 CCR § 66265.253(a)(4) [40 CFR § 265.253(a)(4)] – collection and holding facilities (e.g. tanks, basins) associated with run-on and run-off control systems shall be emptied or otherwise managed expeditiously to maintain design capacity of the system.	<ul style="list-style-type: none"> - EPA inspectors observed liquid and debris inside the sump for the heat exchanger bundle cleaning pad. The sump is not connected to any sewer system and material must be pumped out by the facility. <p>Facility did not have records indicating when the sump for the pad was emptied.</p>	IMGP0240.JPG Appendix 1
	OTHER AREAS OF CONCERN	OTHER AREAS OF CONCERN	

#	Regulatory Citation	Findings/Supporting Notes	Evidence
1		- EPA inspectors observed oily water at the oil truck unloading area inside the Hazardous Waste Accumulation Area.	IMG_0028.JPG Appendix 1
2		- EPA inspectors observed grit from the bead blast operations (California waste code 181) on the ground of the bead blast area of maintenance.	IMGP0315.JPG IMGP0316.JPG Appendix 1
3		- EPA inspectors observed the Selenium Plant roll-off bin for filter press cake was leaking liquid into secondary containment. - Liquid that was sampled by ERG passed TCLP laboratory analysis.	IMGP0296.JPG IMGP0297.JPG Appendix 1 Appendix 5
4		- EPA inspectors observed the cover of roll-off bin at selenium plant was pulled back and not covering the bin. - Phillips 66 stated that the filter press for the selenium plant was repaired and the cover was placed back over the bin.	IMGP0294.JPG IMGP0299.JPG Appendix 1 Appendix 5
5		- EPA inspectors observed empty aerosol cans of spray paint in the paint room of the Maintenance Area.	IMGP0302.JPG IMGP0319.JPG Appendix 1

SECTION V – DOCUMENTS REQUESTED DURING AND AFTER INSPECTION

The following documents were requested at the time of the inspection and have not been received at the time this report was finalized.

1. Training documents for inspecting the dry ORU pond.
2. SOP for inspecting the heat exchanger bundle cleaning pad.
3. Engineered Drawings of Heat Exchanger Bundle Cleaning Pad.

On October 2, 2015 Phillips 66 responded to the document request. Because of a claim of confidential business information (CBI) on the document, the letter and evidence submitted are redacted in Appendix 4.

The following documents pertaining to laboratory waste operations were requested on 10/15/2015 through a formal Information Request Letter.

1. Safety Data Sheets (SDSs) for all solvents used in the facility's laboratory operations.
2. Standard Operating Procedures (SOPs) for waste management operations within the laboratory, including Knock Room and Product Storage.
3. SOPs for management of accumulated material within the accumulation tank, post-accumulation.
4. Evidence (work orders, logs, or reports) for removal of discarded solvents from the laboratory accumulation tank adjacent to building.
5. Tank certification for laboratory accumulation tank (Tank 0).

On November 12, 2015 Phillips 66 Wilmington responded to the formal information request. The response is attached to this report in Appendix 5.

SECTION VI – LIST OF APPENDICES

- Appendix 1 – Photograph Log
- Appendix 2 – Analytical results from ERG sampling
- Appendix 3 – Facility response dated 10/16/2015 to closeout meeting
- Appendix 4 – Facility response to document request dated 10/02/2015
- Appendix 5 – Facility response letter dated 11/12/2015 to Information Request dated 10/15/2015
 - Exhibit 1. Laboratory spent solvent Safety Data Sheets
 - Exhibit 2. Sample Storage SOP
 - Exhibit 3. Sample Storage SOP (Used to show SOP for emptying Tank 0)
 - Exhibit 4. Vacuum truck offloading form (work order for emptying Tank 0)
- Appendix 6 – Site plan
- Appendix 7 – Detailed photo log and contact sheet
- Appendix 8 – Facility response to Information Request on frequency of Tank 0 cleanout dated 08/26/2016.